

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE GOOGLE DIGITAL ADVERTISING
ANTITRUST LITIGATION

No. 21-MD-3010 (PKC)

This Order Relates To All Actions

**PROPOSED ORDER GRANTING PRIVATE PLAINTIFFS’
MOTION FOR INTERIM PROTECTIVE ORDER**

Before the Court is the Private MDL Plaintiffs’ Letter Motion for an Interim Protective Order in the above-captioned litigation, which is GRANTED. It is hereby ordered by the Court that:

1. Google shall produce to all plaintiffs in the MDL the documents that Google has previously produced to any of the state plaintiffs in their digital advertising investigations, whether voluntarily, pursuant to CIDs or otherwise. For the avoidance doubt, Google may not withhold from the foregoing those documents that have also been produced to the Department of Justice.

2. Google shall produce those documents subject to an External Attorneys’ Eyes Only designation. For purposes of this Order, “External Attorneys” refers strictly to those attorneys (and their paralegals, legal assistants, and other legal staff) retained by MDL Plaintiffs in the above-captioned litigation, who have appeared in this case on behalf of MDL Plaintiffs, and who are listed on the Court’s docket as counsel of record for the MDL plaintiffs. For purposes of this Order, excluded from “External Attorneys” are in-house counsel and their paralegals, legal assistants, other legal staff, or any other employee of the MDL Plaintiffs, as well as any expert, consultant, investigator, or other third party assisting the MDL Plaintiffs in this or any other

litigation.

3. The provisions of this Interim Protective Order will continue to be binding until such time as this Court enters a comprehensive Protective Order governing the handling of confidential information in all actions in this multidistrict litigation.

SO ORDERED.

Dated: December __, 2021

P. Kevin Castel
United States District Judge